

**THE IMPACT
OF CONSOLIDATING TYPE I JAIL OPERATIONS
FOR MEDIUM SIZED POLICE AGENCIES**

Article

by

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This Command College project is a FUTURES study of a particular emerging issue in law enforcement. Its purpose is NOT to predict the future, but rather to project a number of possible scenarios for strategic planning consideration.

Defining the future differs from analyzing the past because the future has not yet happened. In this project, useful alternatives have been formulated systematically so that the planner can respond to a range of possible future environments.

Managing the future means influencing the future, creating it, constraining it, adapting to it. A futures study points the way.

The views and conclusions expressed in the Command College project are those of the author and are not necessarily those of the Commission on Peace Officer Standards and Training (POST).

Consolidation of Type I jail operations is a viable alternative for medium sized police departments. This concept is based on the fact that jail facilities are necessities to municipal police agencies and they are becoming increasingly expensive to operate and maintain. Police executives are being pressed by city managers and political leadership to “do more with less and to do it faster, better and cheaper.”ⁱ

Therefore, all aspects of a police department’s operation must be carefully examined in terms of efficiency and effectiveness regarding the overall service levels being provided to the local community. One of those essentials is the jail operation. Although not readily identified by most citizens and politicians within the community as a service level commodity, the jail function, nonetheless, is a vital part of the police department’s mission.

For some medium sized police agencies, there may be the need for self-examination in regards to their jail operation, if they even have one. The factors for consideration are numerous. The most prominent is funding. Can the agency financially support a stand-alone operation? In other words, can the department operate and maintain its own city jail? The significant costs associated with a stand-alone operation relate to staffing and facility needs. Another aspect that could influence the need or desire to operate a jail is the availability of a county jail or alternative jail facilities within a reasonable distance from the department. If such facilities are not readily accessible, then alternatives may need to be sought. If the facilities are accessible, are there any fees or costs attached to their use? Lastly, what are the projected needs for a Type I jail facility based on forecasted crime trends?

The approach for this article is to first examine briefly the current status of jails throughout the State of California. For the sake of this discussion, the jails referred to herein, will include Types II, III, and IV. These jail facilities are local detention facilities used to house

pre-arraignment inmates, convicted, and sentenced inmates, and persons who are permitted access into the community through work furlough programs. The circumstances affecting these facilities have a direct correlation with and impact on Type I jail facilities. The data that will be examined includes the average number of inmate bookings per month and the average daily population. A narrative summation of the *Jail Profile Survey 1999* from the California Board of Corrections will detail the forecast trends relating to jails throughout the state. The statistics will show a paradox that even though crime rates are going down, the number of inmates being booked and housed is still exceeding the available bed space.

Before addressing the issue of jail operations from a local perspective, there needs to be some discussions regarding the State's current status in respect to the number of inmates being booked each month and the average daily population. This data is important because it not only reflects the trends and conditions of the State's larger jail systems, but as will be shown, it has a direct impact on the jail operations for the medium sized police agency.

An examination of the statistics from the California Board of Corrections *Jail Profile Survey 1999* will provide some foundation to this discussion. The Survey collects data relating to jail operations from California's fifty-eight counties, sixty-three local jail jurisdictions, and 136 local jail facilities. It should be noted that the jail capacity represented by the surveyed jails totals about seventy-two thousand beds.ⁱⁱ The Board of Corrections uses this data as a means of identifying trends involving the State's jail system. Although there are several categories and classifications that are collected from the Survey, the two being considered for this paper are Average Number of Persons Booked per Month, and Average Daily Population. The following tables provide this data for a five-year period of time 1994-1998.

Table 1

Average Number of Persons Booked Per Month

5 Year Summary				
1994	1995	1996	1997	1998
103,998	97,589	101,939	99,180	98,915

Table 2

Average Daily Populations (ADP)

5 Year Summary				
1994	1995	1996	1997	1998
69,233	71,107	72,029	76,906	79,149

The data in Table 1 reflects that the number of bookings per month over the five-year period has fluctuated, even though crime rates have steadily decreased throughout the State during the same time period.ⁱⁱⁱ More notable is the finding that regardless of the number of bookings per month, the number of inmates housed in the State's jails far exceeded the available bed space. It is evident from the data in Table 2 that the Average Daily Population increased each succeeding year since 1994.

Based on the perspective presented by the Board of Corrections, the following observations serve notice that current jail conditions are not going to improve without some proactive approach:

“... as the California population increases, there will be increased pressure on the jail system. The mechanisms for reducing this pressure (un-served warrants, pretrial releases, early

releases of sentenced inmates, inmates housed in other jurisdictions under contract, alternative-to-incarceration programs) can go only so far. As the pressure increases we get closer and closer to failing to incarcerate, or releasing early, offenders who represent a threat to public safety. In addition, we will compromise the deterrent value associated with incarceration.”^{iv}

It is further suggested:

“that if there is not a substantial building program initiated in the future, and assuming that the inmate population is restricted to 80,000 inmates due to court-ordered population caps, jail standards, and humanitarian reasons, we will no longer be incarcerating those who should be incarcerated. Rather, we will have to develop some means of accurately identifying the 80,000 most dangerous offenders and taking our chances with the rest.”^v

To illustrate how one factor could have a significant impact on the jail population throughout the State, there are currently 2.1 million un-served misdemeanor, and 243 thousand un-served felony warrants in California. If these warrants were all served within a short period of time, and just a small portion of them resulted in a person going to jail, the jail population would double.^{vi} Based on the data presented above, there is no room for these additional inmates.

To summarize, crime rates throughout the state are declining and it would be speculative at best, to say that the trend would continue for any length of time in the future. The average number of inmate bookings per month has remained relatively constant over a five-year period of time. The average daily population in the jails throughout the state has increased during the same time period. This overcrowding condition is projected to worsen unless there are some substantial jail construction efforts initiated soon. It is reasonable to expect that should these facilities face a crisis situation, there will be serious consequences for local law enforcement agencies that rely on these jails as either primary or even secondary booking sites. The effects could simply be stated that there is no room at the Inn.

To begin this discussion there needs to be a clear understanding of the term Type I jail. Therefore, by definition, a Type I jail facility means a local detention facility used for the detention of persons usually pending arraignment for not more than ninety-six hours, excluding holidays and weekends after booking. Such a Type I facility may also detain persons on court order either for their own safekeeping or sentenced to a city jail as an inmate worker, and may house inmate workers sentenced to the county jail provided such placement in the facility is made on a voluntary basis on the part of the inmate.^{vii}

For those medium sized agencies who currently operate a fully functional Type I jail facility, the reality is that costs are increasing as are the duties, tasks, responsibilities and liabilities to successfully operate such a facility. Pursuant to Title 15, California Code Regulations (CCR), specific requirements are articulated that translate directly into costs to maintain a legally operating jail facility. A few examples include types and frequency of training for personnel, medical/mental services requirements, fire/life safety, facility design, and maintenance, and supplies related to feeding, clothing, bedding, and hygiene needs. Another financial concern is the cost of liability insurance for the jail and its operation. It is becoming more difficult to meet these demands from both a personnel and financial resource perspective. Continued operation of these jail facilities in a status quo condition will mean that police departments will face reduced funding for additional personnel needs, equipment purchases, and other worthwhile programs.

For those small to medium sized police agencies that do not operate a Type I jail facility, there still is a need for access to such a facility. When certain types of arrests are made, the inmate must be booked and detained until arraignment. Depending upon the distance to the county jail and/or alternative jail site, time becomes a commodity. The time an officer spends

transporting and processing a inmate at an off- site location is time not spent in the field for patrol related activities. Or in the case of some agencies with temporary holding facilities, the officer may find him or herself standing by in the jail area for hours at a time, waiting to release a inmate from custody. In both examples, there is a cost factor in terms of soft dollars being spent for support activities by front line personnel.

The question begs asking then, if a Type I jail operation is desired or needed, and due to costs is unaffordable, what are the alternative options? The first is to book all inmates that may be detained for longer than twenty-four hours into the county jail. As was illustrated earlier in this article, those facilities throughout the State are in an overcrowded condition and arguably may not be as accessible for all types of bookings in the future. If that choice is not practical, there are two other options that are currently employed in the State of California, they are public contracting or outsourcing and private contracting or privatization. At the time of this writing, there are ninety-four Type I jail facilities operated by municipal police agencies in the State of California. Of those, Baldwin Park, Irvine, Montebello, San Bernardino, San Diego, Seal Beach and Garden Grove are contracted to private vendors by municipal police agencies.^{viii}

There is much debate regarding both the merits and the shortfalls of the two contracting options. The arguments in favor of and those against contracting jail services are similar for both public outsourcing and privatization. In most cases, when mention is made to contracting jail or prison services, the reference is being made in regards to privatization. A leading proponent of prison privatization is Charles H. Logan, Ph.D., Professor of Sociology at the University of Connecticut. He has written extensively on the subject and has created a list of arguments for and against privatization. Although the list was established in respect to prisons, the stated

arguments below are relevant to the discussion for Type I jails. The below listed items pertain to both public outsourcing and to private contracting or privatization unless so indicated.

Some of the more persuasive arguments for contracting are as follows:^{ix}

- Contracting across jurisdictions permits economies of scale.
- Contracting may reduce overly generous public employee pensions and benefits.
(privatization)
- Contracting counteracts the motivation of budget-based government agencies to continually grow in size and to maximize their budgets.
- Contracting avoids cumbersome and rigid government procurement procedures; vendors can purchase more quickly, maintain lower inventories, and negotiate better prices and values. (privatization)

Some of the more persuasive arguments against contracts are as follows:^x

- Contracting for imprisonment involves an improper delegation to private hands of coercive power and authority. (privatization)
- Contracting jails raises legal questions about the potential use of deadly force.
(privatization)
- Contracting may cost more in the long run as a result of “low-balling” the initial bids followed by unjustifiable price increases in subsequent contracts.
- Contracting will not allow the government to escape liability. (privatization)
- Contracting may limit flexibility by the vendor refusing to go beyond the terms of the contract without renegotiation.

One of the foremost concerns regarding private firms or companies contracting for jail services in the State of California is that “there is no statutory authority for public entities such as

cities or counties to delegate public officer or peace officer powers to privately employed jail staff pursuant to Penal Code 830 et seq. Civilian jail staff employed by private firms cannot perform certain duties such as: necessary use of force (chemical agents, lethal and less than lethal weaponry); search, seizure and arrest; accessing confidential records; among others”.^{xi} This is certainly a major issue that must be considered prior to contracting with a private vendor. From a legal position the question needs to be asked, do civilians have legal protections of qualified immunity from certain lawsuits as would public employees? Until there is some definitive resolution to this issue either by legislation or litigation, there will be uncertainty regarding the legality of privatization of jail services in California.

Another alternative to the stand-alone model is by contracting for jail services from another agency. Again, this concept has not gained favor with any significant number of agencies throughout the State. Public outsourcing however does not fall victim to the same concerns regarding public employee versus private civilian employee matters. There are nevertheless, a couple of concerns that are directly related to public contracting. One of those is liability. In this case, the entity providing the service assumes a greater exposure to liability. With increased numbers of inmates, comes increased potential for incidents resulting in lawsuits. Although the costs for this exposure may be passed along in the costs for the contract, the settlement for a sizable judgment may not. The second concern is less tangible and applies largely to those agencies that have or have had a Type I jail facility. That fear is that the contracted department is being broken up piecemeal. Regardless of the logic behind the move, there will be those who worry that no element or unit within the organization is safe. It comes down to the fear of change.^{xii}

Typically, this option has been used more by the medium to large sized police agencies than with the smaller jurisdictions. For the low end user of jail facilities, it is more practical to use another agency's facilities than to bear the burden of maintaining their own. This may be measured in terms of personnel and operational costs versus overall usage on an annual basis. Depending upon the terms and language of the contract, this option can offer some benefits to both parties of the agreement. The most prominent benefit with this option is cost reduction for both parties. In simple terms, both agencies share costs for the operation of one jail facility. The down side to such arrangements includes loss of management control by the contracting agency and increased liability exposure by the contractor agency. As stated earlier, the perception seems to be that one agency is giving itself away piecemeal to its neighbor.

Summarizing then, we can assume that most police agencies have a need for a Type I jail facility, either in conjunction with or in exclusion of county jail facilities. Forecasted conditions relating to the operation of such facilities i.e., costs, overcrowding of county facilities, etc. will encourage police administrators to examine alternative options to their own stand-alone model. If traditional alternatives do not meet or satisfy the needs of those police administrators, then what options are foreseeable? It is suggested that consideration be given to consolidation efforts.

According to *Webster's II New College Dictionary*, the term to *consolidate* means "To unite into one system or body."^{xiii} The concept of consolidation is not new to law enforcement. Examples include the consolidation of dispatch services among police and fire agencies. The theory being, that through economy of scale, there will be cost savings to the stakeholders. If the consolidation is formed correctly, there should be only limited loss of control by any of the participating parties and there should be no decrease or derogation in service levels.

There is relatively little literature available on the subject matter of consolidating jail operations. One of the few exceptions is a document titled, *Briefing Paper: Regional Jails* that was published in January of 1992, by the National Institute of Corrections Information Center. The definition of consolidated jails presented in this document was “multi-jurisdictional detention facilities in which two or more jurisdictions share in both the initial capital construction and ongoing operating costs. Representatives of the jurisdictions jointly organize, administer, operate, and finance the facilities through an annual budget. Currently in the State of California, there are no consolidated adult jail operations in existence.”^{xiv}

As was presented in the discussions relating to contracting jail services, there are advantages and disadvantages to this format of jail operations as well. The chief obstacles to successful implementation of a consolidated jail effort are political rather than technical. Some barriers include:

- Absence of legal authority to permit the sharing of resources across jurisdictional lines.
- Differences in management philosophy.
- Perceived inequities in proportionate sharing of costs.
- Lack of cooperation from judicial authorities.
- Disagreement over the location of the jail.
- “Turf issues,” the loss of authority and control by the police chief and city governing bodies.

Some of the advantages to consolidating jail operations include:

- Costs are shared proportionately with participating members.
- Cities with limited resources have access to better and more modern facilities.

- Staff are professional, and advanced management practices are used.
- Consolidated jail operations have greater access to community resources.
- There is an economy of scale regarding staffing needs.
- Police chief and city governing bodies still have some authority and control regarding the operation of the jail, although reduced from a stand-alone operation.

By examining the two lists carefully, it becomes apparent that some of the advantages are also listed disadvantages. Depending upon how the Joint Powers Authority and the governance structures are established, there can be bi-polar results. The advantages outweigh the negatives however, when given the choice between an expensive stand-alone jail operation versus a joint venture enterprise.^{xv}

One of the concerns often expressed in discussions regarding consolidation is that with the very effort to do more with less, the consolidation effort through a Joint Powers Agreement creates a whole new bureaucracy. The creation of a new governmental entity is often times the by-product of a Joint Powers Agreement. Most traditional Joint Powers Authorities are created with the formation of a new agency. This new agency, like any other, requires policy makers, management oversight, supervision, and a work force. It additionally requires a budget, documented policies and procedures, personnel rules and regulations, a payroll system, legal counsel, insurance, etc., all of those things that are found within each and every police agency. Dependent upon the manner in which a Joint Powers Agreement is structured, this alternative could be more expensive and uncontrollable than which is currently in place. The means to success is by combining existing resources without constructing new organizational layers.

Through cooperative partnerships and creative insights towards governance configurations, the horrors of conventional Joint Powers Agreements do not have to come to fruition.

To illustrate the point, the consolidated dispatch center for the cities of Cypress, Los Alamitos and Seal Beach will be used as an example. The dispatch center known as the West Cities Communications Center Joint Powers Authority or hereinafter referred to as West-Comm, initiated operations in September of 1997. The significant aspect of this Joint Powers Authority is that it truly is a cooperative effort to consolidate a common function among the three police agencies. The function of dispatch services was duplicated in each of the three agencies. The budget items for this function not only included personnel costs, but equipment and supplies as well. In order to save monies, the three cities formed a cooperative Joint Powers Authority. The intent was to reduce costs by reducing the total number of personnel and eliminating as much bureaucracy as possible.

To accomplish this goal, the Joint Powers Agreement established a structure that included a Board of Directors, comprised of one city council member from each of the three cities. An Administrative Oversight Staff was created and staffed by the three city managers and the three police chiefs. The Dispatch Administrator position was created to manage the day-to-day operations of the dispatch center. By uniting all of the dispatchers from the three agencies, the supervisor, lead and dispatcher positions were filled to make up the workforce manning the center. The result was a Board of Directors who established policy and approved the budget. Each member of the Board has an equal vote on any issue. The Administrative Oversight Staff was created to implement the policies of the Joint Powers Authority and to provide management oversight to the operations of the Center. Each member of the Oversight Staff has an equal vote

on any pending issue. The Dispatch Administrator position is responsible for the day-to-day management of the Center. This position reports directly to the Administrative Oversight Staff.

The Dispatch Administrator position is the only one of the administrative and management positions that is paid from the Joint Powers Authority budget. All others administrative or management positions that were identified assume their Joint Powers Authority responsibilities as collateral duties to their normal daily jobs. The supervisors, leads, and dispatchers are paid from the Joint Powers Authority budget. In regards to the support services aspects of the Joint Powers Authority, i.e. personnel, finance, legal services, and building maintenance, these functions are divided up amongst the three agencies and are considered to be *soft* costs. There may be some disagreement that such services are to be viewed as *soft* costs. Arguably these services do impact the budgets of other departments within each of the three cities. The compromise, however is that these costs may be more readily absorbed within the cities budgets than with the necessity of creating these functions separately within the Joint Powers Authority. Finally, the means of funding the consolidation effort is determined through a formula based on the calls for service and populations being served by each jurisdiction. This formula articulates the percentage of funding each city contributes to the Joint Powers Authority budget.

The physical facilities for West-Comm are located at the Seal Beach Police Department. Although connected to the police department building, the dispatch center is in fact a separate and unique agency. The reason for using an existing site versus an off-site location was two fold. It was determined to be less expensive to make modifications to an existing site and the morale of the employees who wanted to maintain a connection with a police department were viable considerations.

Now by taking this model and putting it into the perspective of a Type I jail operation, one might be able to see the possibilities of a consolidation effort. Assuming that three medium sized police agencies identified a need to operate a Type I jail facility. The three jurisdictions could create a Joint Powers Authority that fashions a governance structure that effectively manages the new agency without creating an additional and unnecessary bureaucracy. The Board of Directors could be city council members, the Administrative Oversight Staff could be the city managers and chiefs of police, and the Jail Administrator could either be hired from outside of the three agencies as a new position or the responsibility could be given on a two year rotating basis to a captain from each of the three agencies. The responsibility may or may not be considered to be a full time assignment. This would have to be determined by the agency executives.

Current jailor personnel from each of the agencies could be pooled to work the one facility. If no current personnel exist or if a limited number are available, then recruitment efforts would have to be initiated. The total number of personnel to staff the consolidated jail facility should be less than if the three agencies were staffing their jails independently of each other. This is where the majority of cost savings are going to be realized. As in the West-Comm example, the support services functions relating to personnel, finance, legal services, etc. could be divided up amongst the three cities and absorbed into their respective budgets. Do to obvious cost factors; the actual jail facility would most likely be selected from one of the three agencies.

In regards to such issues as policies and procedures, personnel rules and regulations, disciplinary matters and operational procedures, etc., these may be extracted from existing documents from one to all three of the agencies or new ones can be drafted specifically for the

jail operation. Most regulatory directives and requirements are found in Title 15 and Title 24 (CCR) and thus should be consistent with all three agencies.

The impacts then for consolidating Type I jail operations could mean significant cost savings to each of the agencies participating in the unification effort. Unlike, contracting or privatization, each agency maintains some portion of administrative control over the operation of the jail function. In regards to the liability and funding aspects of consolidating the jail function, each agency would be responsible for a designated percentage of the overall costs. Depending upon the terms of the Joint Powers Agreement, each agency would certainly have less financial accountability than currently exists independent of each other. The employees of the Joint Powers Authority would be classified as public employees and would therefore be empowered by statute to work in the jail. Lastly, with direct supervision and oversight of the jail function, quality control and service levels should not be lessened for any of the stakeholders.

Although the concept of consolidation is not new to law enforcement, the hypothesis has not been seriously considered for such functions as jail operations. It would appear from the State statistics that jail overcrowding is going to continue to be an issue into the future. The needs of medium sized police agencies for Type I jail facilities will also continue to exist. If there are legal issues involving the privatization of jail services and if there are liability concerns related to public outsourcing of jail services, an alternative could be consolidation.

This article examined the concept of consolidation as an alternative approach to conducting Type I jail operations. The conclusions arrived at from this project are base on three outlooks. The first is that as we progress into the 21st century, the demands on the statewide jail system will increase. There has been no indication that there will be a significant movement towards building any new jail or detention facilities soon. If the trend relating to the number of

inmates booked per month begins to increase and no relief has been sought regarding the available bed space, there will be a crisis at hand. This article discussed that potential solutions to jail overcrowding include pretrial releases, early releases of sentenced inmates and alternatives to incarceration programs. Although some of these choices are appropriate in certain cases, it should not be assumed that any one of them would be a favored preference over incarceration.

The second belief is that the operation of a Type I jail facility for a small to medium sized police agency is very costly. This suggestion is based on interviews with city managers, police chiefs, and finance directors. These expenditures are generated through personnel costs, liability insurance, supply and equipment needs, and maintenance of the facilities. The two most expensive are personnel costs and liability insurance. Appropriate staffing levels for Type I jail facilities is crucial in terms of meeting the requirements of Title 15 and Title 24 of the California Code of Regulations and with respect to liability exposure. Personnel costs for jail staff would include salaries, benefits and training requirements. The minimum staffing levels would be dependent upon the needs of the agency. The fact remains, that the majority of the jail budget will be dedicated to personnel costs. The other major expense is liability insurance. Premiums can vary from region to region and agency-to-agency, depending upon the nature of the jail operation and upon any significant claims filed against the agency. They can range from thousands to hundreds of thousands of dollars.

The third hypothesis is that most medium sized police agencies need access to Type I jail facilities. The demand is based on the activity of the department in regards to the number of arrests made per month. Obviously, the more proactive a department is in respect to enforcement proceedings the greater the need for a jail facility. In this regard, the concern becomes, does the agency have its own Type I jail facility or does it use one off-site? This could

be a county jail or a neighboring agency's jail. Factors to consider are what is the driving distance to that jail? How much time does an officer spend transporting and booking a inmate at an off-site location? Are there booking or contract fees attached to the use of the facility? These factors have cost implications associated with them. The bottom line becomes how will medium sizes police agencies address their respective needs for jail services?

For some agencies, the desire or ability to operate a Type I jail is not there. They have elected to seek alternatives to the stand-alone operation. The options include using the county jail, contracting with another agency to use their facility, or to contract with a private vendor to operate the jail out of their own facility. Discussions in this article outlined the various advantages and disadvantages regarding each alternative. Chief executives for each agency must analyze their respective situations in terms of needs and resources. The solution for one agency may not be acceptable or practical for another. What the data has indicated, however, is that not many police departments in the State of California have opted to outsource through public contracts their jail services or to contract them through private vendors. If increases in booking or contract fees become unacceptable, then what other options exist?

An alternative that has not been explored or implemented to date is the consolidation of Type I jail operations between two or more agencies. A consolidation effort represents a method in which each participating department maintains a percentage of ownership in the jail operation. They share control, costs, liabilities, and services. The consolidation approach exploits the economy of scale principle, while reducing overall costs to the stakeholders. Consolidation methodologies allow for more direct control over costs and operational decision-making. The merits of consolidating jail operations are worth examination.

The outcomes then for consolidating Type I jail operations could mean significant cost savings to each of the agencies participating in the unification effort. Unlike, contracting or privatization, each agency maintains some share of administrative control over the operation of the jail. In regards to the liability and funding facets of consolidating the jail function, each agency would be responsible for a designated percentage of the overall costs. Depending upon the terms within the Joint Powers Agreement, each agency would certainly have less financial accountability than currently exists independent of each other. The employees of the Joint Powers Authority would be classified as public employees and would therefore, be empowered by statute to work in the jail. Lastly, with direct supervision and oversight of the jail function, quality control and service levels should not be lessened for any of the stakeholders.

Although not viewed as the cure all or final solution to an agencies jail woes, the prospect of consolidating jail services does offer opportunities and benefits that have heretofore not been explored.

ENDNOTES

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- ⁱ Mark Ochendusko, City Manager, City of Coronado, Former City Manager of City of Cypress. June 25, 1997, Interview
- ⁱⁱ California Board of Corrections, Jail Survey Profile 1999, Executive Summary
- ⁱⁱⁱ U.S. Department of Justice, Federal Bureau of Investigation, Crime in the United States, 1995,1996,1997,1998,1999, Index of Crime by Region
- ^{iv} California Board of Corrections, Jail Profile Survey 1999, Perspective
- ^v California Board of Corrections, Jail Profile Survey 1999, Perspective
- ^{vi} California Board of Corrections, Jail Profile Survey 1999, Executive Summary
- ^{vii} California Code of Regulations, Title 15, Section 1006(hh), p. 4
- ^{viii} Bill O'Connor, Field Representative, California Board of Corrections, September 20, 2000, Interview
- ^{ix} Charles H. Logan, Private Prisons: Cons and Pros, New Cypress, Oxford University Press, 1990, pp. 41-48
- ^x Charles H. Logan, Private Prisons: Cons and Pros, New Cypress, Oxford University Press, 1990, pp. 41-48
- ^{xi} Douglas A. Holien, Field Representative, California Board of Corrections, Issues Paper: Privately Operated Jails, March 1997, pp 4-5
- ^{xii} Mark Ochendusko, City Manager, City of Coronado, Former City Manager City of Cypress, June 25, 1997, Interview
- ^{xiii} Webster's II New College Dictionary (1999), s.v. "Consolidation"
- ^{xiv} Bill O'Connor, Field Representative, California Board of Corrections, September 20, 2000, Interview
- ^{xv} Mike McCrary, Chief of Police, City of Los Alamitos, November 22, 2000, Interview

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